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Attorneys for Plaintiff/Counter Defendant
PMA MEDIA GROUP, INC.

and

Third-Party Defendant
STEPHEN SCANLON

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PMA MEDIA GROUP, INC. , a Utah
Corporation,

Plaintiff,
vs.

RAPID RESPONSE MARKETING, LLC, a
Nevada Limited Liability Company, KEVIN
DE VINCENZI, an individual; DOES I
through X; and ROE CORPORATIONS XI
through XX,

Defendants.

CASE NO.: 2:10-cv-0058-JCM-RJJ

**JOINT PROPOSED DISCOVERY PLAN
AND SCHEDULING ORDER (SPECIAL
SCHEDULING REVIEW REQUESTED)**

RAPID RESPONSE MARKETING, LLC, a
Nevada limited liability company,

Counter-Claimant and
Third-Party Plaintiff,

and

KEVIN DE VINCENZI, an individual,

1 Counter-Claimant,

2
3 v.

4 PMA MEDIA GROUP, INC., a Utah
5 corporation,

6 Counter-Defendant,

7 and

8 STEPHEN SCANLON, an individual,

9 Third-Party Defendant.

10 **JOINT PROPOSED DISCOVERY PLAN AND SCHEDULING ORDER**

11 **(SPECIAL SCHEDULING REVIEW REQUESTED)**

12 Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 26-1, Plaintiff/Counter Defendant,
13 PMA MEDIA GROUP, INC.; Defendant/Counter-Claimant/Third-Party Plaintiff, RAPID
14 RESPONSE MARKETING, LLC; Defendant/Counter-Claimant, KEVIN DE VINCENZI;
15 and Third-Party Defendant, STEPHEN SCANLON hereby submit the following proposed
16 Joint Discovery Plan and Scheduling Order.

17 In accordance with FRCP Rule 26(f), a discovery conference between the parties
18 was held on March 11, 2010. Jacob D. Bundick, Esq., of the law firm of Ballard Spahr
19 LLP, for Plaintiff/Counter Defendant, PMA MEDIA GROUP, INC. and Third-Party
20 Defendant, STEPHEN SCANLON; Bradley J. Richardson, Esq., of the law firm of Gordon
21 & Silver, Ltd., for Defendant/Counter-Claimant/Third-Party Plaintiff, RAPID RESPONSE
22 MARKETING, LLC; and Third-Party Defendant, KEVIN DE VINCENZI.

23 1. Discovery Cut-Off Date: Defendants first appeared on January 19, 2010.
24 The parties propose the discovery cut-off date to be November 19, 2010, which is ten
25 (10) months from the date the Defendants first appeared.

26 2. Amending the Pleadings and Adding Parties: The last date to file motions
27 to amend the pleadings or add parties is August 20, 2010.
28

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3. FRCP 26(a) (2) Disclosures (Experts): Expert disclosures will be due by September 20, 2010 and rebuttal disclosures will be due by October 20, 2010.

4. Dispositive Motions: Dispositive motions will be filed by December 20, 2010.

5. Pretrial Order: The Pretrial Order must be filed by January 19, 2011 unless dispositive motions have been filed, in which event the Pretrial Order will be due thirty days after decision or further order of the Court.


6. FRCP 26(a) (3) Disclosures: The parties will make their initial disclosures no later than fourteen (14) days after the entry of this order.

Dated this 27 day of April 2010.

Dated this ___ day of April 2010.

GORDON & SILVER LTD.

BALLARD SPAHR LLP

By: 
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By: /s/ Matthew L. Moncur
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 Defendant/Counter-Claimant/Third-
 Party Plaintiff, RAPID RESPONSE
 MARKETING, LLC;
 Defendant/Counter-Claimant, KEVIN
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 Defendant STEPHEN SCANLON

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1 Dated this _____ day of _____, 2010.

2 IT IS SO ORDERED:

3
4 UNITED STATES MAGISTRATE JUDGE
5 DATED: _____

6 Submitted By:

7 BALLARD SPAHR LLP

8
9 By: /s/ Matthew L. Moncur

10 Matthew L. Moncur, (*Admitted Pro Hac Vice*)

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17 Plaintiff/ Counter Defendant PMA MEDIA

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18 STEPHEN SCANLON

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